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Federal Communication Commission  
Bureau / Office

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of

Amendment of Section 73.202(b),  
Table of Allotments,  
FM Broadcast Stations  
(Mt. Union, Huntingdon, Centre Hall, and  
South Williamsport, Pennsylvania)

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MB Docket No. 03-231  
RM-10818

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Federal Communications Commission  
Office of the Secretary

COMMENTS OF DAME BROADCASTING LLC

Dame Broadcasting, LLC ("Dame"), parent company of the licensees of WBUS(FM), Boalsburg, PA; WRSC(AM), State College, PA; WQWK(FM), University Park, PA; WJHT(FM), Port Matilda, PA; and WBLF(AM), Bellefonte, PA, hereby comments on the Commission's Notice of Proposed Rulemaking in the above-captioned proceeding<sup>1</sup> and the Petition for Rulemaking of Megahertz Licenses, LLC ("Megahertz" or "Petitioner")<sup>2</sup> to amend the FM Table of Allotments, which preceded the NPRM. Megahertz's Petition and the NPRM propose to upgrade station WXMJ(FM) to Class B1 status and to move the station into the State College, Pennsylvania market by allotting WXMJ a new community of license, Centre Hall, Pennsylvania, in place of its current community of license, Mount Union, Pennsylvania.

To effectuate the change in allotment, Megahertz proposes the reallocation of station WWLY(FM), channel 292A, from Huntingdon, Pennsylvania, to Mount Union, Pennsylvania to "backfill" the WXMJ move; an upgrade of WXMJ from a Class A station to a Class B1 station; and the reallocation of WXMJ from Mount Union to Centre Hall. The proposal

<sup>1</sup> *In the Matter of Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Mt. Union, Huntingdon, Centre Hall, and South Williamsport, Pennsylvania), Notice of Proposed Rulemaking, DA 03-3552 (rel. Nov. 14, 2003) ("NPRM").*

<sup>2</sup> *Petition for Rulemaking of Megahertz Licenses LLC filed in MB Docket No. 03-231, RM-10818 on Jan. 3, 2003 ("Petition").*

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would require WZXR(FM), South Williamsport, Pennsylvania, to move its existing transmitter site to the northeast to accommodate WXMJ's move into State College, PA.

Although Megahertz did not provide adequate information in its Petition for the Commission to analyze Centre Hall's independence from State College and the gains and losses in each affected service area resulting from the proposed changes,<sup>3</sup> the motivation behind Megahertz's Petition is plain to see. The Petitioner's proposal is nothing more than a ploy to allow Megahertz to serve 100% of the already well-served State College market – not Centre Hall, as the Petitioner claims. Centre Hall, which is only 10 miles from State College,<sup>4</sup> is not sufficiently independent of State College to justify a first local service preference under the Commission's FM allotment priorities. Moreover, and as Megahertz itself admits, the Megahertz's proposed move-in would come at the expense of over 1300 people living in a portion of the loss area that would be created by the proposal. Megahertz's proposal would leave this sizeable population newly underserved by eliminating their ability to receive station WMXJ. As demonstrated below, Commission precedent very clearly disfavors this type of disruption of existing service, and thus, the Petition should be denied.

The Commission indicated in the NPRM that Megahertz failed to provide sufficient information regarding Centre Hall's independence from State College and sufficient data about the gains and losses in each affected service area, and, therefore, the Commission instructed Megahertz to supply additional information in its comments.<sup>5</sup> Dame reserves the right to comment during the reply period on any supplemental information that Megahertz may provide.

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<sup>3</sup> See NPRM at ¶¶ 6-7.

<sup>4</sup> See <http://www.indo.com/distance/> (distance from State College, PA to Centre Hall, PA).

<sup>5</sup> NPRM at ¶¶ 6-7.

## I. COMMISSION POLICIES DISFAVOR MOVE-IN PETITIONS.

Megahertz claims that its proposed amendment to the FM Table of Allotments serves the public interest because it will provide first local service to Centre Hall without removing the sole local service at Mount Union. However, the Commission has repeatedly stated that it will not blindly apply the first local service preference of the FM allotment priorities when a station seeks to reallocate a channel to a suburban community of a nearby urban area.<sup>6</sup> Relocating WXMJ to Centre Hall represents just that -- a reallocation to a tiny bedroom community of a larger metropolitan area. The fact that Megahertz will provide a 70 dBu signal over 100% of the State College Urbanized Area is not insignificant. In fact, relocating WXMJ's transmitter to Centre Hall will encompass all of State College, the home of Penn State University, which is far more profitable than serving a town with a population of less than 1100.

Rather than turning a blind eye to the true purpose of Megahertz's move-in proposal, the Commission should enforce its existing rules and policies and treat move-in proposals like Megahertz's with the critical inquiry that they deserve. The "bedrock obligation" of broadcasters is to serve the needs and interests of their community of license.<sup>7</sup> As consolidation in the radio and television markets has intensified over the last several years, and as consolidators have built "market clusters" of stations, the Commission has recognized an increased urgency to ensure that stations like WXMJ serve the interests of their current

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<sup>6</sup> *Modification of FM and TV Authorizations to Specify a New Community of License*, Memorandum Opinion and Order, 5 FCC Rcd 7094, 7096 (1990) ("New Community Order").

<sup>7</sup> *Deregulation of Radio*, Report and Order, 84 FCC 2d 968, 977, 982 (1981), *on recon.*, 87 FCC 2d 797 (1981), *remanded on other grounds sub nom. Office of Communication of the United Church of Christ v. FCC*, 707 F.2d 1413 (D.C. Cir. 1983). See also *En Banc Programming Inquiry*, 44 FCC 2303, 2312 (1960) ("The principal ingredient of [the public interest] obligation consists of a diligent, positive and continuing effort by the licensee to discover and fulfill the tastes, needs and desires of his service area.").

communities of license. Indeed, last year the Commission initiated a Localism Task Force, which will explore possible steps that the Commission can take to strengthen localism in broadcasting.<sup>8</sup> Although additional policies may be required to achieve these goals, the Commission has existing rules and policies that it can enforce to ensure that licensees adhere to the bedrock obligation of localism.

## **II. CENTRE HALL IS NOT A COMMUNITY FOR ALLOTMENT PURPOSES.**

When a station proposes to reallocate a channel from a community located outside of an urbanized area to a community located partially or entirely within an urbanized area, the Commission requires a *Tuck* showing.<sup>9</sup> The *Tuck* criteria are as follows: (1) signal population coverage; (2) the size of the suburban community relative to the adjacent city; and (3) the interdependence of the suburban community with the central city. Because Megahertz proposes to move WXMJ into the State College Urbanized Area, the Commission concluded that it would apply the requirements of *Tuck* to determine whether Centre Hall is entitled to preference as a first local service.<sup>10</sup>

However, the Petitioner did not provide in its Petition sufficient information for a *Tuck* showing. Therefore, Dame is unable at this time to provide a meaningful response to Petitioner's claim that Centre Hall constitutes a community for allotment purposes. Accordingly,

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<sup>8</sup> See FCC Chairman Powell Launches "Localism in Broadcasting Initiative," Public Notice, rel Aug. 20, 2003.

<sup>9</sup> *Faye & Richard Tuck, Inc.; KBEC, Waxahachie, Texas; Bluebonnet Radio Broadcasters, Inc., Plano, Texas; Century Broadcasting Corp. Garland, Texas; Dontron, Inc. KPBC, Garland, Texas; For Construction Permit for a New AM Station*, Memorandum Opinion and Order, 3 FCC Rcd 5374 (1988) ("*Tuck*").

<sup>10</sup> NPRM at ¶5.

Dame reserves the right to comment more extensively at the reply stage after the Petitioner has provided the Commission with the required additional information.

Nevertheless, based on information generally available from public sources, Dame doubts that Megahertz can demonstrate that Centre Hall is sufficiently independent of State College to warrant a first local service allotment. Centre Hall is a tiny bedroom community located a mere 10 miles away from State College, and the community is clearly subsumed in the State College advertising market. If, as Dame anticipates, Megahertz is unable to demonstrate that Centre Hall is independent of State College, the Commission should deny the Petition.

### **III. COMMISSION POLICIES DICTATE THAT EXISTING SERVICE SHOULD BE PRESERVED.**

Megahertz claims that its proposal serves the public interest because it will result in a first local service for Centre Hall without removing the sole local service at Mount Union. Even assuming *arguendo* that this claim is correct, it does not provide a sufficient basis for granting Megahertz's Petition. Significantly, Megahertz's proposal would remove a fifth local transmission service from over 1300 people in a portion of the proposal's loss area.<sup>11</sup> The creation of new underserved area with a significant population is a serious flaw in Megahertz's proposal, which the Commission should not dismiss lightly. Indeed, Commission precedent strongly disfavors disruption of existing service.

The Commission has repeatedly stated that

“the public has a legitimate expectation that existing service will continue, and this expectation is a factor [it] must weigh independently against the service benefits that may result from reallocating a channel from one community to another

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<sup>11</sup> See Technical Statement (“Exhibit I”).

regardless of whether the service removed constitutes a transmission service, a reception service, or both.”<sup>12</sup>

The creation of an underserved area in order to provide yet another service to already well-served Centre Hall<sup>13</sup> (and the equally well-served State College Urbanized Area) would not advance the public interest. Rather than disrupt existing service to over 1300 people, the Commission should maintain the status quo because the existing arrangement of allotments better serves the public interest. Accordingly, the Commission should dismiss the Petition and terminate the NPRM proceeding.

In addition, the Commission should reject Petitioner’s attempt to offset the number of underserved people in the loss areas created by its proposal. In an unorthodox fashion unsupported by precedent, Petitioner attempts to “massage the numbers” to divert the Commission’s attention from the new underserved area created by the proposal. Petitioner’s attempt to offset the more than 1300 people in the new underserved area with listeners in the proposal’s gain area completely ignores the Commission’s strong policy against disruption of existing service and the creation of new underserved area. As a result, Petitioner is unable to cite *any* caselaw to support its methodology. Such an attempt to divert the Commission’s view from

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<sup>12</sup> *In the Matter of Amendment of the Commission’s Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License*, Memorandum Opinion and Order, 5 FCC Rcd 7094, 7097 at ¶19.

<sup>13</sup> In the event the Commission determines (contrary to Dame’s expectation) that Centre Hall is sufficiently independent of State College to warrant a first local service preference, Dame is willing to agree to a dual city allotment for its station WBUS(FM) that would include both Centre Hall and Boalsburg. Station WBUS(FM) currently provides 70 dBu coverage to Centre Hall from its existing transmitter site with a clear line of sight. The dual city designation would ensure that Centre Hall receives a first transmission service, and because Dame would not have to relocate its transmitter site, no gain or loss areas would be created by the dual city licensing. Rather than grant Megahertz’s Petition, which will create an underserved area affecting over 1300 people, the Commission should deny Megahertz’s petition and instead modify Dame’s license to provide for a Centre Hall-Boalsburg dual city allotment.

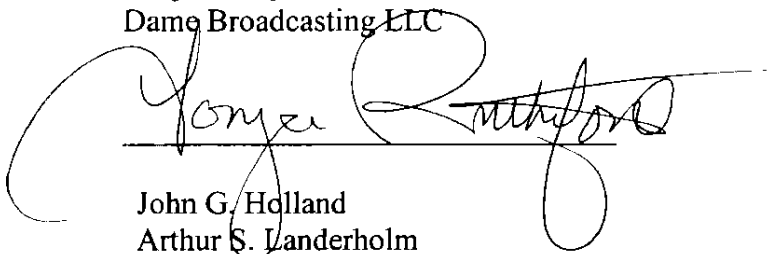
the significant number of newly underserved people in the proposal's loss areas should be rejected out of hand.

In addition, as the Commission itself recognized in the NPRM, more specific information is necessary to thoroughly analyze the impact of Petitioner's proposal on the existing service areas.<sup>14</sup> Dame will provide further comment at the reply stage of this proceeding on the additional gain and loss information supplied by Megahertz.

#### IV. CONCLUSION

As set forth above, the Commission should reject the Megahertz proposal because Megahertz has not demonstrated that Centre Hall is sufficiently independent from State College and because Megahertz's proposal would create new underserved area with significant population, which is strongly disfavored under Commission precedent, and raises significant public interest concerns. In short, the existing arrangement of allotments better serves the public interest, and, accordingly, the Commission should dismiss the Petition and terminate the NPRM proceeding.

Respectfully submitted,  
Dame Broadcasting LLC



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January 5, 2004

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<sup>14</sup> NPRM at ¶7.

**Exhibit 1**



TECHNICAL STATEMENT  
SUPPORTING THE COMMENTS FROM  
DAME BROADCASTING, LLC  
CONCERNING THE NPRM IN  
MB DOCKET NO. 03-231

This Technical Statement has been prepared on behalf of Dame Broadcasting, LLC (Dame) and supports Dame's comments concerning the Federal Communications Commission (FCC) Notice of Proposed Rule Making (NPRM) in MB Docket No. 03-231 (RM-10818). The NPRM concerns the proposal from Megahertz Licenses, LLC (Megahertz) to make certain changes in the FCC's FM table of allotments and a change in the transmitter site location for a FM station.

Megahertz proposes to change the channel 258A (99.5 MHz) commercial FM allotment at Mount Union, Pennsylvania to channel 258B1 at Centre Hall, Pennsylvania, and modify the license of station WXMJ (FM) accordingly. Megahertz proposes to change the channel 292A (106.3 MHz) allotment at Huntingdon, Pennsylvania to channel 292A at Mount Union, Pennsylvania, and modify the license of station WWLY (FM) accordingly. In order to accomplish the above allotment changes, Megahertz also proposes to change the transmitter site of station WZXR (FM) on channel 257A (99.3 MHz) at South Williamsport, Pennsylvania.

Figure 1 is a map showing the predicted coverage for the present and proposed WXMJ, WWLY and WZRX operations. The 1 mV/m (60 dBu) coverage contours are circles based on maximum facilities for each station's classification. The areas gaining 1 mV/m coverage by Megahertz's proposed changes are shown "cross-hatched". The areas losing 1 mV/m coverage are shown with "vertical lines". The common areas (i.e., areas receiving 1 mV/m coverage from the present and proposed WXMJ, WWLY and WZXR operations) are shown clear or unshaded.

The following is a summary of the population (2000 Census) within the gain/loss/common areas shown on Figure 1. The population count has been determined by summing the population for the individual census blocks whose centroid falls within the study area.

<u>Region</u>	<u>Population</u>	<u>Land Area</u>
Gain Areas	204,322	4,966 sq km
Loss Areas	28,202	1,002
Common Areas	190,340	4,536

The FCC's database has been used to determine the number of other aural (radio) services (FM & AM) available to the gain and loss areas shown on Figure 1. For FM stations, the 1 mV/m contour is a circle based on maximum facilities for the class. For AM stations, the night interference-free limit has been calculated and the appropriate groundwave contour value determined using soil conductivities from FCC Figure M3. Figure 2 is a map showing the gain/loss areas and the contours of the various other radio services in the area. All of the gain loss areas receive 5 or more other radio services except those areas identified by a number. The number indicates the number of other aural services available to that area. The following is a breakdown of the population and land area for the other services available to the gain and loss areas.

**Gain Area**

Number of Other

<u>Radio Services</u>	<u>Population</u>	<u>Land Area</u>
0	0	0 sq km
1	177	11
2	2,495	265
3	8,141	479
4	1,260	185
<u>5 or more</u>	<u>192,249</u>	<u>4,026</u>
Total	204,322	4,966

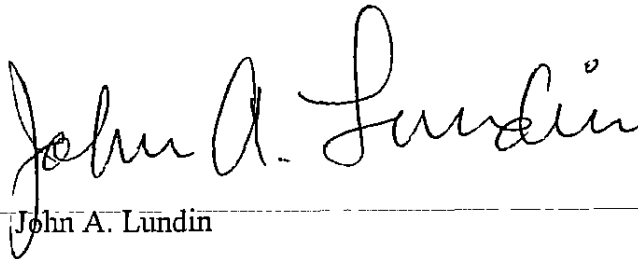
**Loss Area**

Number of Other

<u>Radio Services</u>	<u>Population</u>	<u>Land Area</u>
0	0	0 sq km
1	0	0
2	0	0
3	0	0
4	1,334	41
<u>5 or more</u>	<u>26,868</u>	<u>961</u>
Total	28,202	1,002

Figure 3 is a listing of the other radio assignments considered in preparing Figure 2.

If there are questions concerning this technical statement, please communicate with the office of the undersigned.



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January 5, 2004

# COMPOSITE COVERAGE MAP SHOWING PROPOSED GAIN AND LOSS AREAS

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

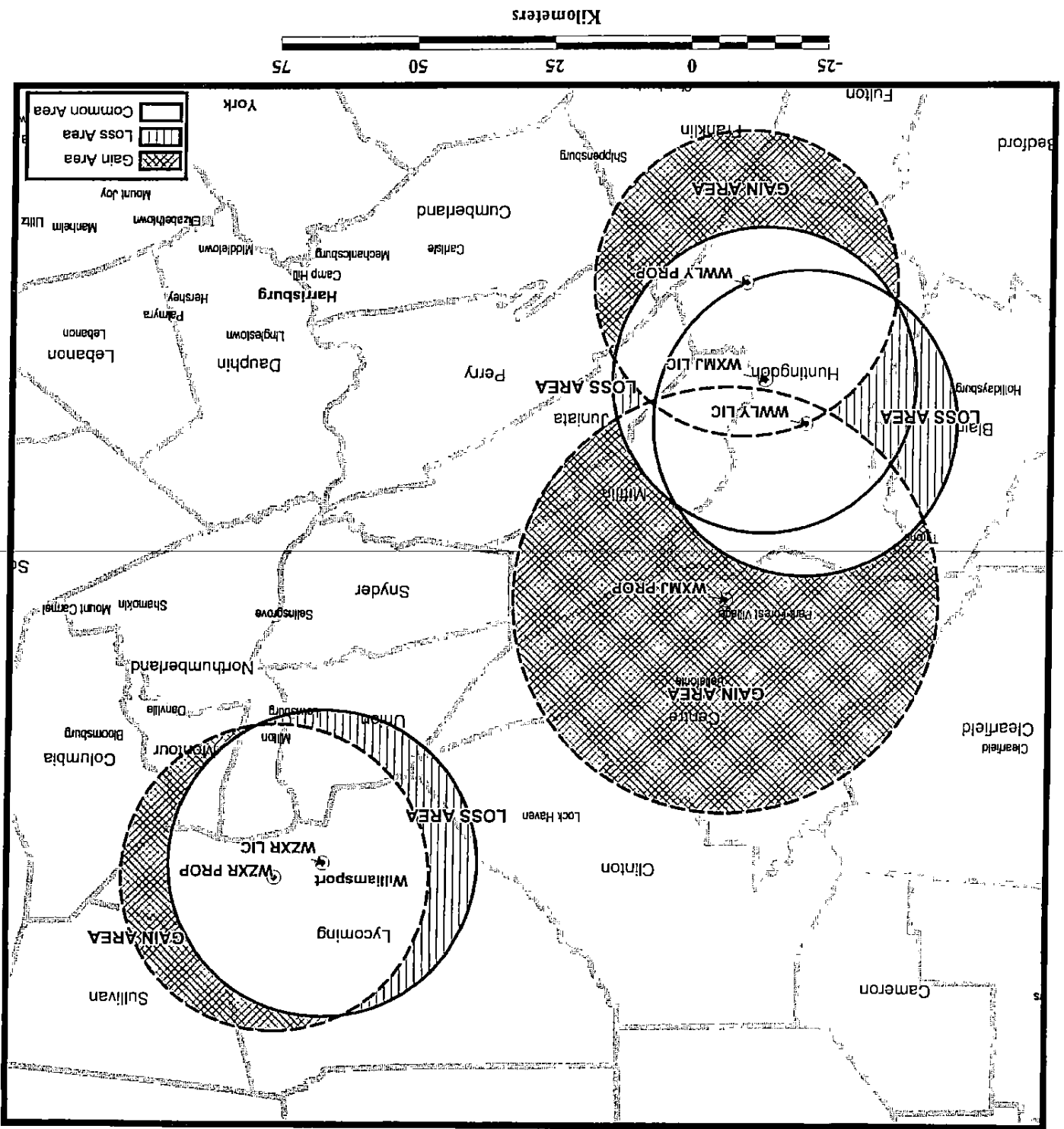
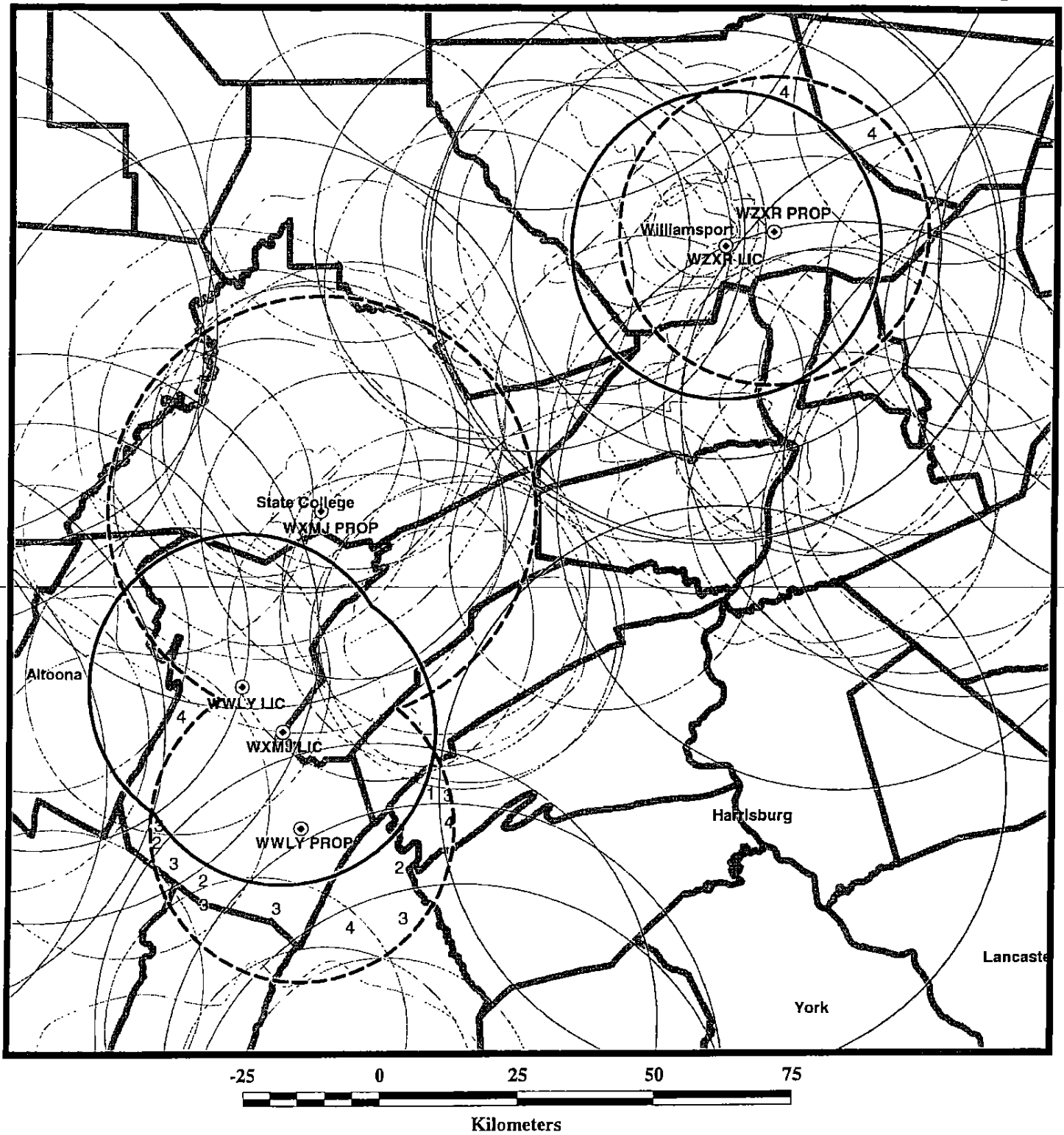


Figure 1

Figure 2



### OTHER RADIO SERVICES AVAILABLE TO GAIN/LOSS AREAS

du Trenl, Lundin & Rackley, Inc Sarasota, Florida

Figure 3

**WXMJ (FM) / OTHER CLASS A SERVICES**

WSNU	LOCK HAVEN	PA	41-08-49	077-29-15	221
WJUN-F	MEXICO	PA	40-34-58	077-29-47	223
WJSM-F	MARTINSBURG	PA	40-17-37	078-15-37	224
WBUS	BOALSBURG	PA	40-45-08	077-45-15	229
WLTS	STATE COLLEGE	PA	40-54-04	077-50-19	233
WBXQ	CRESSON	PA	40-24-11	078-31-34	234
WZWW	BELLEFONTE	PA	40-53-35	077-51-47	237
WMRF-F	LEWISTOWN	PA	40-36-30	077-34-44	239
WVNW	BURNHAM	PA	40-35-10	077-41-39	244
WQWK	UNIVERSITY PARK	PA	40-48-27	077-56-28	246
WVRT	MILL HALL	PA	41-13-14	077-16-38	249
WOWY	PLEASANT GAP	PA	40-55-58	077-45-39	254
WQBR	AVIS	PA	41-13-45	077-22-01	260
WBHV	STATE COLLEGE	PA	40-45-09	077-45-14	276
WLAK	HUNTINGDON	PA	40-29-51	078-07-59	278
WCXR	LEWISBURG	PA	40-58-38	077-06-59	279
WEEO-F	MCCONNELLSBURG	PA	39-55-25	077-57-19	279
WALY	BELLWOOD	PA	40-34-01	078-26-31	280
WMAJ-F	HOLLIDAYSBURG	PA	40-34-01	078-26-31	285
WCHX	LEWISTOWN	PA	40-39-43	077-34-27	288
WUBZ-F	PHILIPSBURG	PA	40-47-34	078-10-28	290
WLZS	BEAVER SPRINGS	PA	40-42-04	077-12-49	291
WZYY	RENOVO	PA	41-18-19	077-44-44	295
WQJU	MIFFLINTOWN	PA	40-34-20	077-30-50	296
WJHT	PORT MATILDA	PA	40-55-11	077-58-27	300

**WXMJ (FM) / OTHER CLASS B SERVICES**

WRBT	HARRISBURG	PA	40-18-58	076-57-00	235
WIKZ	CHAMBERSBURG	PA	39-55-41	077-41-43	236
WFGY	ALTOONA	PA	40-34-01	078-26-31	251
WGLU	EBENSBURG	PA	40-24-41	078-46-28	256
WGMR	TYRONE	PA	40-55-10	077-58-27	266
WWMD	WAYNESBORO	PA	39-49-44	077-33-09	268
WOWQ	DU BOIS	PA	41-02-43	078-42-10	271
WKSB	WILLIAMSPORT	PA	41-11-21	076-58-52	274
WNNK-F	HARRISBURG	PA	40-18-59	076-57-03	281
WILQ	WILLIAMSPORT	PA	41-11-43	076-58-17	286
WDBA	DU BOIS	PA	41-11-28	078-41-26	297

**WXMJ (FM) / OTHER CLASS B1 SERVICES**

WQYX	CLEARFIELD	PA	41-04-05	078-31-07	226
WJSA-F	JERSEY SHORE	PA	41-13-28	077-22-47	242
WPRR	ALTOONA	PA	40-34-11	078-26-24	261

**WXMJ (FM) / OTHER NCE SERVICES**

WTLR	STATE COLLEGE	PA	40-53-32	077-51-48	210
WKPS	STATE COLLEGE	PA	40-47-58	077-52-10	214
WJRC	LEWISTOWN	PA	40-34-20	077-30-50	215
WPSU-F	STATE COLLEGE	PA	40-55-11	077-58-27	218

Figure 3

**WWLY(FM) / OTHER CLASS A FM SERVICES**

WSRT	MERCERSBURG	PA	39-48-34	077-48-21	221
WJUN-F	MEXICO	PA	40-34-58	077-29-47	223
WJSM-F	MARTINSBURG	PA	40-17-37	078-15-37	224
WBUS	BOALSBURG	PA	40-45-08	077-45-15	229
WQCM	GREENCASTLE	PA	39-47-29	077-40-29	232
WLTS	STATE COLLEGE	PA	40-54-04	077-50-19	233
WBXQ	CRESSON	PA	40-24-11	078-31-34	234
WZWW	BELLEFONTE	PA	40-53-35	077-51-47	237
WMRF-F	LEWISTOWN	PA	40-36-30	077-34-44	239
WVNW	BURNHAM	PA	40-35-10	077-41-39	244
WQWK	UNIVERSITY PARK	PA	40-48-27	077-56-28	246
WOWY	PLEASANT GAP	PA	40-55-58	077-45-39	254
WBHV	STATE COLLEGE	PA	40-45-09	077-45-14	276
WLAK	HUNTINGDON	PA	40-29-51	078-07-59	278
WEEO-F	MCCONNELLSBURG	PA	39-55-25	077-57-19	279
WALY	BELLWOOD	PA	40-34-01	078-26-31	280
WSKE	EVERETT	PA	40-00-04	078-24-03	282
WMAJ-F	HOLLIDAYSBURG	PA	40-34-01	078-26-31	285
WCHX	LEWISTOWN	PA	40-39-43	077-34-27	288
WUBZ-F	PHILIPSBURG	PA	40-47-34	078-10-28	290
WQJU	MIFFLINTOWN	PA	40-34-20	077-30-50	296
WJHT	PORT MATILDA	PA	40-55-11	077-58-27	300

**WWLY(FM) / OTHER CLASS B FM SERVICES**

WRBT	HARRISBURG	PA	40-18-58	076-57-00	235
WIKZ	CHAMBERSBURG	PA	39-55-41	077-41-43	236
WMTZ	JOHNSTOWN	PA	40-19-45	078-53-53	243
WFGY	ALTOONA	PA	40-34-01	078-26-31	251
WGLU	EBENSBURG	PA	40-24-41	078-46-28	256
WGMR	TYRONE	PA	40-55-10	077-58-27	266
WWMD	WAYNESBORO	PA	39-49-44	077-33-09	268
WNNK-F	HARRISBURG	PA	40-18-59	076-57-03	281
WAYZ-F	HAGERSTOWN	MD	39-41-47	077-30-46	284

**WWLY(FM) / OTHER CLASS B1 SERVICES**

WPRR	ALTOONA	PA	40-34-11	078-26-24	261
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**WWLY(FM) / OTHER CLASS NCE SERVICES**

WTLR	STATE COLLEGE	PA	40-53-32	077-51-48	210
WCRH	WILLIAMSPORT	MD	39-39-34	077-57-55	213
WJRC	LEWISTOWN	PA	40-34-20	077-30-50	215
WPSU-F	STATE COLLEGE	PA	40-55-11	077-58-27	218



Figure 3

**WZXR(FM) / OTHER CLASS A SERVICES**

WSNU	LOCK HAVEN	PA	41-08-49	077-29-15	221
WLGL	RIVERSIDE	PA	40-57-30	076-42-52	222
WBLJ-F	SHAMOKIN	PA	40-45-36	076-32-18	237
WBYL	SALLADASBURG	PA	41-14-00	077-12-09	238
WGGI	BENTON	PA	41-09-32	076-24-05	240
WPGM-F	DANVILLE	PA	40-59-16	076-32-50	244
WVRT	MILL HALL	PA	41-13-14	077-16-38	249
WWBE	MIFFLINBURG	PA	40-53-27	076-59-53	252
WSPI	MOUNT CARMEL	PA	40-49-09	076-27-44	259
WQBR	AVIS	PA	41-13-45	077-22-01	260
WVLY-F	MILTON	PA	40-57-12	076-45-04	265
WDKC	COVINGTON	PA	41-43-25	077-02-45	268
WKAB	BERWICK	PA	41-05-11	076-16-40	278
WCXR	LEWISBURG	PA	40-58-38	077-06-59	279
WCOZ	LAPORTE	PA	41-26-06	076-28-27	280
WEGH	NORTHUMBERLAND	PA	40-47-10	076-41-48	297
WRVH	WILLIAMSPORT	PA	41-12-39	076-57-16	300

**WZXR(FM) / OTHER CLASS B SERVICES**

WMGS	WILKES-BARRE	PA	41-10-56	075-52-21	225
WQKX	SUNBURY	PA	40-47-07	076-41-50	231
WBSX	HAZLETON	PA	41-04-55	075-56-54	250
WAVT-F	POTTSVILLE	PA	40-49-50	076-12-31	270
WKSJ	WILLIAMSPORT	PA	41-11-21	076-58-52	274
WNBT-F	WELLSBORO	PA	41-44-17	077-21-49	283
WILQ	WILLIAMSPORT	PA	41-11-43	076-58-17	286
WFYY	BLOOMSBURG	PA	40-56-18	076-25-37	293

**WZXR(FM) / OTHER CLASS B1 SERVICES**

WBZD-F	MUNCY	PA	41-12-42	076-57-15	227
WJSA-F	JERSEY SHORE	PA	41-13-28	077-22-47	242
WHGL-F	CANTON	PA	41-44-32	076-50-07	262

**WZXR(FM) / OTHER NCE SERVICES**

WBGM	NEW BERLIN	PA	40-53-27	076-59-53	201
WPTC	WILLIAMSPORT	PA	41-14-11	077-01-31	201
WQSU	SELINGSGROVE	PA	40-57-06	076-45-02	205
WVYA	WILLIAMSPORT	PA	41-14-54	077-01-51	209
WCIT	TROUT RUN	PA	41-27-26	077-06-54	211
WVBU-F	LEWISBURG	PA	40-57-18	076-52-54	213
WCRG	WILLIAMSPORT	PA	41-13-50	077-08-58	214
WGRC	LEWISBURG	PA	40-56-40	076-52-44	217
WRLC	WILLIAMSPORT	PA	41-14-42	076-59-49	219

## CERTIFICATE OF SERVICE

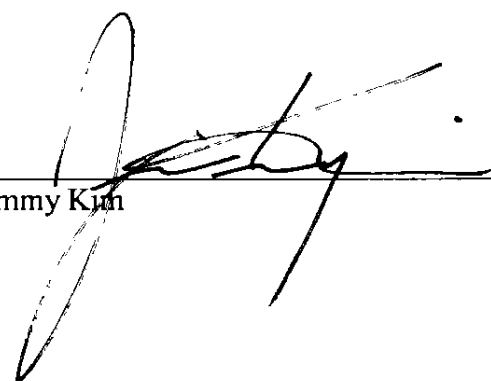
I, Jimmy Kim, hereby certify that on this 5th day of January 2004, I caused copies of the foregoing Comments of Dame Broadcasting LLC to be sent via first class mail, postage prepaid to the following:

Allan G. Moskowitz  
Kaye Scholer LLP  
901 15<sup>th</sup> Street, N.W.  
Suite 1000  
Washington, D.C. 20005

John A. Karousos\*  
Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

\* Hand-delivered

Jimmy Kim

A handwritten signature in black ink, appearing to read 'Jimmy Kim', is written over a horizontal line. The signature is stylized with a large loop at the beginning and a long, sweeping tail.